

JAMA Comments on the European Commission's Proposal to Reduce CO₂ Emissions from Light Duty Vehicles

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A. General Comments

In reviewing the target value for CO₂ emissions from light commercial vehicles, JAMA believes that sufficient consideration should be given to their particular characteristics in terms of use, structure and technological features, which differentiate them from passenger cars.

Before discussing a CO₂ target value for light commercial vehicles, an accurate CO₂ database for those vehicles should be established so as to enable the conduct of a quantitative impact assessment in their regard.

Also important is the provision of sufficient lead time prior to enforcement, particularly in view of the fact that the production cycle of light commercial vehicles is longer than that of passenger cars.

B. Specific Comments

1. General issues

1.2 Scope

For the product lineups of JAMA members, we agree that the scope of the proposal should be consistent with Euro 5 and Euro 6 standards.

Q1: What is your opinion about the possibility to merge the proposal on passenger cars and the proposal on light commercial vehicles into one piece of legislation?

We disagree with the integration of target values for these two vehicle types because their CO₂ reduction potential is not the same, owing to their differing characteristics in terms of use and structural and technological features.

Q2: What is your opinion on the issue of overlapping of M and N vehicles?

The only way that seems feasible is to deal with this overlap issue based on the categories set forth in COC.

2. CO₂ reduction targets

2.1 Costs related to the implementation of targets

Costs and impacts on CO₂ reduction for passenger cars and light commercial vehicles differ, even if the same technologies are employed for both of them. Moreover, in many cases it is difficult to apply the technologies employed for passenger cars to light commercial vehicles because of various technical and economic restrictions. For these and other reasons, the cost data used in the case of passenger cars

cannot be used in the case of light commercial vehicles.

2.2 Long-term targets / 2.3 Overall target

As stated here in 1.1.2, the CO₂ reduction potential differs between passenger cars and light commercial vehicles because of their different characteristics, uses, and so on. We disagree with a single integrated target value because it would create an uneven playing field among manufacturers.

Q1: Do you possess any additional information on costs associated with technological improvements required to achieve the targets?

This would be highly confidential information belonging to the manufacturers themselves. JAMA would find it difficult to provide such data.

Q2: What are your views on the cost-effectiveness of the measure given current oil prices?

Certainly, as oil prices increase, reducing vehicle running costs becomes all that more significant. However, higher oil prices will not affect the difficulties manufacturers confront in introducing high-cost technologies because (a) higher initial costs will have to be reflected in vehicle purchase prices, which will meet with consumer resistance, and (b) a further decrease in CO₂ emissions will require even costlier technologies, leading to decreased cost-effectiveness.

Q3: How can long-term emission reduction targets be set for light commercial vehicles?

A comprehensive impact assessment using reliable data should be conducted initially, followed by a thorough examination of the need for new regulatory measures.

If and when a long-term target value is set, an intermediate review period should also be defined so as to be able to take into consideration the current status of technological development as well as market and overall economic conditions.

3. Specific formulation of the target

3.2 Slope

As regards concerns about increased weight resulting from the adoption of the mass-based parameter, consideration should be given to the fact that there will be a greater deterrent for light commercial vehicles than for passenger cars from the viewpoint of the transport (utility) function of the vehicles and other specific characteristics.

Q1: Do you agree that mass and footprint are suitable parameters for the utility function?

We support the utility parameter-based approach. From this standpoint, we do not object to the assessment of mass and footprint as the parameters. However, when comparing these two, we think it is reasonable to use mass as the basic parameter in principle, because it has a stronger correlation to CO₂ emission. Depending on the results of analysis conducted on the basis of a robustly constructed database, it may become necessary to include another parameter or to define the categories according to characteristics.

4. Pooling

Q1: Do you have any observations regarding pooling of manufacturers?

We agree with pooling, as it will increase flexibility in achieving target compliance.

5. Compliance mechanism

Q1: Do you have any observations regarding the compliance mechanism?

Our position on this issue is no different from the position we have conveyed to the Commission in regard to passenger cars: namely, we would request that any penalty levels established in this respect be no less fair and appropriate than penalty levels set for other sectors.

6. Derogations

Q1: Do you have any observations regarding the derogations for small volume manufacturers?

We agree with this concept in principle.
